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Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

ESTATE OF JAMES M. GOODMAN; and
AUDREY GOODMAN, in her capacity as Personal
Representative of the Estate of James M. Goodman,

Defendants.

Adv. Pro. No. 10-04762 (CGM)

**MOTION TO REDACT CERTAIN EXHIBITS TO DECLARATIONS OF NICHOLAS J.
CREMONA, LISA M. COLLURA, AND BRUCE G. DUBINSKY IN SUPPORT OF
TRUSTEE'S MOTION FOR SUMMARY JUDGMENT**

Irving H. Picard, as trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III (“SIPA”), and the chapter 7 estate of Bernard L. Madoff, respectfully submits this motion to redact pursuant to 11 U.S.C. §§ 105(a) and 107(c) of title 11 of the United States Bankruptcy Code.

1. On March 22, 2022, the Trustee filed the following declarations in support of the Trustee’s motion for summary judgment:

- *Declaration of Nicholas J. Cremona in Support of Trustee’s Motion for Summary Judgment*, ECF No. 107 (the “Cremona Declaration”);
- *Declaration of Lisa M. Collura in Support of Trustee’s Motion for Summary Judgment*, ECF No. 108 (the “Collura Declaration”); and
- *Declaration of Bruce G. Dubinsky in Support of Trustee’s Motion for Summary Judgment*, ECF No. 109 (the “Dubinsky Declaration”).

2. The Cremona, Collura, and Dubinsky Declarations included certain exhibits that displayed confidential information (“Confidential Information”).

3. This Confidential Information should have been filed in redacted form pursuant to Rule 9037(a) of the Federal Rules of Bankruptcy Procedure.

4. The Trustee hereby requests that the Court enter the attached Proposed Order (Exhibit A) and the following exhibits (the “Exhibits”) be replaced with redacted versions:

- Exhibits 6–7 to the Cremona Declaration;
- Exhibit 4 to Attachment B to the Collura Declaration; and
- Exhibits 31–33 to Attachment A to the Dubinsky Declaration.

5. The redacted versions of the Exhibits will be provided to the Court.

Dated: March 28, 2022
New York, New York

/s/ Nicholas J. Cremona
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7 Estate of Bernard L. Madoff*